

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 12/28/99 16 00

Site Contact(s): T C Baker
Phone: 303 966-4329

Regulatory Contact: Chris Gilbreath
Phone: 303 692-3371

Agency: Colorado Department of Public Health and Environment,
Hazardous Materials and Waste Management Division

Purpose of Contact: Report and discuss premature process pipe removal from system #14, Building 771

Discussion

B771 liquids team made unexpectedly rapid progress in removing all liquid from the process piping in system #14. The quick finish of tap and drain activities left the team free for other work. The foreman requested and received approval to begin pipe removal on system #14. There was no hold point or check required in the combined IWCP. The CDD for system #14 had been drafted, but was not issued for the approval cycle. CDPHE had not seen the CDD in any form and had not given any type of approval.

When I discovered that removal was in progress, I informed closure team management of the problem. The system was immediately put into a safe configuration and further work was stopped. I then contacted Chris Gilbreath by phone and informed him of the situation and we proceeded to discuss the path forward. After several options were discussed we agreed

- 1 I would proceed to issue and get the CDD approved by normal channels as rapidly as possible
- 2 Pipe removal on system #14 would remain on hold until formal approval was received from CDPHE
- 3 A step would be inserted in future IWCPs before pipe removal activities requiring signature confirmation that the proper CDD was approved and in place
- 4 I would attend the fact finding meeting at 10AM Wed and confirm that facts were as stated. And report back to Chris any changes to our understanding

I did attend said meeting on Dec 29 and have discussed results with Chris A couple slight variations to our understanding were agreed to in the meeting and with/by Chris Gilbreath

- 1 The confirmation signature discussed in #3 above would come from the environmental compliance manager or designee
- 2 In addition, I will provide an updated list with the current status of CDDs at each Monday planning meeting for use by CCAs at their POD meetings
- 3 The system #14 pipe that has been removed and stored in GB K-30 should be size reduced and waste packaged now to prevent any future confusion

The CDD has been issued to K-H for submittal to CDPHE on 12/29/99

Contact Record Prepared By: Thomas C Baker

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